

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant,

and

MACMILLAN PUBLISHING GROUP, LLC
d/b/a HENRY HOLT AND COMPANY,

Relief-Defendant.

Case No. 1:19-cv-1197-LO-TCB

ADDENDUM A *

	Host/Source	Date	Amount
1	Wired – Interview with James Bamford	8/13/2014	\$18,000*
2	Harvard University	10/23/2014	\$18,000*
3	CATO Institute	12/12/2014	\$18,000*
4	The World Affairs Conference	2/2/2015	\$18,000*
5	ACLU Davis-Levin Conference	2/14/2015	\$18,000*
6	Int'l Students for Liberty Conference	2/19/2015	\$18,000*
7	CeBIT Global Conferences 2015	3/18/2015	\$18,000*
8	Future Fest	4/ 20 /2015	\$18,000*
9	Princeton University	5/1/2015	\$18,000*
10	Nordic Media Festival	5/8/2015	\$18,000*
11	Numberg Messe GmbH	10/8/2015	\$25,000
12	Bishops University	11/3/2015	\$16,000
13	PEN – Newseum	11/10/2015	\$18,000*
14	Queen's University	11/12/2015	\$10,000
15	Park City Performing Arts Foundation	12/8/2015	\$30,000
16	University of Colorado, Boulder	2/16/2016	\$28,000
17	Johns Hopkins University	2/17/2016	\$20,000
18	Liberty Forum Free State Project	2/20/16	\$18,000*
19	WorldHostingDays - GmbH	3/16/2016	\$17,000

20	University of Arizona Foundation	3/25/2016	\$16,000
21	Simon Fraser University	4/5/2016	\$20,000
22	Evil Twin Booking, Roskilde	6/28/2016	\$16,000
23	McGill University	11/2/2016	\$12,000
24	Start Page	11/10/2016	\$18,000*
25	University of Waterloo	1/9/2017	\$25,000
26	CANTECH	1/17/2017	\$18,000*
27	Middlebury College	3/16/2017	\$18,000
28	Free Library of Philadelphia	3/11/2017	\$16,800
29	William and Mary College	4/8/2017	\$18,000*
30	One World Identity for K(NOW) Identity	5/15/2017	\$25,000
31	Estoril Global, Portugal	7/13/2017	\$18,000*
32	London Speakers Bureau for Innovera	11/21/2017	\$15,000
33	Tulane University	1/29/2018	\$18,000
34	Blockstack Signature Berlin	3/2/2018	\$20,000
35	University of Alberta	3/27/2018	\$18,000
36	Windman LTD, Tel Aviv	11/6/2018	\$15,000
37	Dalhousie University	5/30/2018	\$18,000*
38	BTC Media, San Francisco	6/29/2019	\$15,000
39	Web3 Technologies Foundation, Berlin	9/24/2019	\$20,000
40	Columbia University	10/31/2019	\$18,000*
41	WebSummit	11/4/2019	\$18,000*
42	Campus Party Official	7/11/2020	\$18,000*
43	Imputed from R. 37 sanction**	n/a	\$18,000*
44	Imputed from R. 37 sanction**	n/a	\$18,000*
45	Imputed from R. 37 sanction**	n/a	\$18,000*
46	Imputed from R. 37 sanction**	n/a	\$18,000*
47	Imputed from R. 37 sanction**	n/a	\$18,000*
48	Imputed from R. 37 sanction**	n/a	\$18,000*
49	Imputed from R. 37 sanction**	n/a	\$18,000*
50	Imputed from R. 37 sanction**	n/a	\$18,000*
51	Imputed from R. 37 sanction**	n/a	\$18,000*
52	Imputed from R. 37 sanction**	n/a	\$18,000*
53	Imputed from R. 37 sanction**	n/a	\$18,000*
54	Imputed from R. 37 sanction**	n/a	\$18,000*
55	Imputed from R. 37 sanction**	n/a	\$18,000*
56	Imputed from R. 37 sanction**	n/a	\$18,000*
	TOTAL		\$1,027,800

* In the Court's order granting the United States' motion for discovery sanctions pursuant to Fed. R. Civ. P. 37, the Court held that "[f]or every speech or speaking engagement for which Snowden is liable to the United States under Count Two, but for which the United States lacks evidence of how much Snowden was paid, the Court deems as established that Snowden was

paid his median speech earnings, as calculated by the subset of speeches documented in [a spreadsheet the United States obtained through third-party discovery].” ECF No. 120 at 12 ¶ 3. The parties agree that this median amount is \$18,000. All speeches on this spreadsheet for which the United States is relying on the sanctions amount are denoted with an asterisk (*).

** As a further discovery sanction, the Court held that, “[f]or the subset of . . . speeches as to which the United States has been unable to locate any public recording or transcription, the Court deems as established that in at least 31% of them . . . [Snowden] displayed slides or other visual aids” that fell within the scope of his prepublication review obligations. ECF No. 120 at 13 ¶ 5. At the time the Court issued its ruling, there were 61 speeches in this subcategory. The United States subsequently updated its list based on further publically available information, and 45 speeches now fall into this category. The parties agree that pursuant to the Court’s sanctions ruling, the United States should obtain relief for 31 percent, or 14, of those speeches, and these speeches are denoted with a double asterisk (**).